

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

3 Melissa Baily (Bar No. 237649)

melissabaily@quinnemanuel.com

4 Lindsay Cooper (Bar No. 287125)

lindsaycooper@quinnemanuel.com

5 50 California Street, 22nd Floor

San Francisco, California 94111-4788

6 Telephone: (415) 875-6600

7 Facsimile: (415) 875-6700

8 *Attorneys for GOOGLE LLC*

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 SAN FRANCISCO DIVISION

12 GOOGLE LLC,

13 Plaintiff,

14 vs.

15 SONOS, INC.,

16 Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**GOOGLE'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

I. INTRODUCTION

Pursuant to Civil Local Rule 79-5(f), Google LLC (“Google”) respectfully submits this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed in connection with Google’s Opposition to Sonos, Inc.’s (“Sonos”) Motion for Summary Judgment Pursuant to the Court’s Patent Showdown Procedure (“Opposition”) and documents filed in support thereof contain information that Sonos may consider confidential pursuant to the Stipulated Protective Order (“Protective Order”) entered by this Court. Dkt. 94. Accordingly, Google seeks to file under seal the documents and information as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Google’s Opposition	Portions highlighted in blue and green; portions outlined in blue boxes	Google (in green) & Sonos
Exhibit 3 to Declaration of Marc Kaplan in Support of Google’s Opposition (“Kaplan Decl.”)	Entire Document	Sonos
Exhibit 4 to Kaplan Decl.	Entire Document	Google & Sonos
Exhibit 7 to Kaplan Decl.	Entire Document	Sonos

Materials and documents may be provisionally filed under seal pursuant to Civil Local Rule 79-5(f) when the document, or portions thereof, “has been designated as confidential by another party or non-party.” L.R. 79-5(f). Google has redacted the green- and blue-highlighted portions of its Opposition and portions of the Opposition outlined in blue boxes and submitted the above exhibits in support thereof under seal because information therein may be considered by Sonos as “CONFIDENTIAL BUSINESS INFORMATION” or “HIGHLY CONFIDENTIAL – SOURCE CODE,” or “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order.

In compliance with Civil Local Rule 79-5(d) and (e), unredacted versions of the above listed documents accompany this Administrative Motion and redacted versions of the above listed

1 documents have been filed publicly. In accordance with Local Rule 79-5(c)(3), Google has also
2 filed a Proposed Order herewith.

3 DATED: May 5, 2022

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

4
5 By: /s/ Charles K. Verhoeven
Charles K. Verhoeven (Bar No. 170151)
charlesverhoeven@quinnemanuel.com
6 Melissa Baily (Bar No. 237649)
melissabaily@quinnemanuel.com
7 Lindsay Cooper (Bar No. 287125)
lindsaycooper@quinnemanuel.com
8 50 California Street, 22nd Floor
9 San Francisco, California 94111-4788
10 Telephone: (415) 875-6600
Facsimile: (415) 875-6700

11 *Attorneys for GOOGLE LLC*
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule 5-1, I hereby certify that, on May 5, 2022, all counsel of record who have appeared in this case are being served with a copy of the foregoing via the Court's CM/ECF system and email.

DATED: May 5, 2022

By: /s/ Charles K. Verhoeven
Charles K. Verhoeven